

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

EDNA WEBB, <i>et al.</i>,	§	
Plaintiffs,	§	
	§	No. 4:14-cv-03302
v.	§	Consolidated with
	§	<i>Adams v. Livingston</i> , 4:14-cv-3326
	§	<i>Togonidze v. Livingston</i> , 4:14-cv-3324
BRAD LIVINGSTON, <i>et al.</i>,	§	
Defendants.	§	

**DEFENDANT TEXAS DEPARTMENT OF CRIMINAL JUSTICE’S NOTICE OF
FOURTH SUPPLEMENTAL DISCLOSURES TO PLAINTIFFS**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Defendant Texas Department of Criminal Justice (TDCJ), by and through its attorney of record, the Office of the Attorney General for the State of Texas, to give notice to the Court of Defendant TDCJ’s Fourth Supplement to Initial Disclosures to Plaintiffs in accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure.

This supplemental disclosure consists of records which are also responsive to: (a) Plaintiff Kevin Webb’s First Requests for Production upon TDCJ numbers 4, 16, 32, and 35, (b) Plaintiffs’ Second Consolidated Requests for Production upon TDCJ numbers 3, 12, 35-38, and 66 and (c) Plaintiff Kevin Webb’s First Request for Production upon Defendant Tommie Haynes number 3. TDCJ’s responses to these requests for production were supplemented concurrently with this Fourth Supplemental Disclosure.

DATED: January 13, 2017

Respectfully submitted,

KEN PAXTON

Attorney General of Texas

JEFFREY C. MATEER

First Assistant Attorney General

BRANTLEY STARR

Deputy First Assistant Attorney General

JAMES E. DAVIS

Deputy Attorney General for Civil Litigation

LACEY E. MASE

Assistant Attorney General

Chief, Law Enforcement Defense Division

/s/Amanda M. Kates

AMANDA M. KATES

Assistant Attorney General

Co-Counsel

State Bar No. 24075987

Southern District No. 2878366

Amanda.Kates@oag.texas.gov

HAROLD J. LILLER

Assistant Attorney General

Co-Counsel

State Bar No. 24029689

Southern District ID No. 351997

Harold.Liller@oag.texas.gov

CYNTHIA L. BURTON

Assistant Attorney General

Attorney in Charge

State Bar No. 24035455

Southern District ID No. 35273

Cynthia.Burton@oag.texas.gov

MATTHEW J. GREER

Assistant Attorney General

Co-Counsel

State Bar No. 24069825

Southern District ID No. 1171775

Matthew.Greer@oag.texas.gov

DANIEL C. NEUHOFF
Assistant Attorney General
Co-Counsel
State Bar No. 24088123
Southern District No. 2374885
Daniel.Neuhoff@oag.texas.gov

Office of the Attorney General of Texas
Law Enforcement Defense Division
P. O. Box 12548, Capitol Station
Austin TX 78711
(512) 463-2080/Fax (512) 936-2109

ATTORNEYS FOR TDCJ DEFENDANTS

NOTICE OF ELECTRONIC FILING

I, **AMANDA M. KATES**, Assistant General of Texas, do hereby certify that I have electronically submitted for filing, a true and correct copy of the above in accordance with the Electronic Case Files System of the Southern District of Texas, on this the 13th day of January, 2017.

/s/Amanda M. Kates
AMANDA M. KATES
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **AMANDA M. KATES**, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing Defendant Texas Department of Criminal Justice's Notice of Fourth Supplemental Disclosures to Plaintiffs has been served by e-mail and via CMRRR, on this 13th day of January, 2017 addressed to:

Attorneys for Plaintiffs

Jeff Edwards
Scott Medlock
David James
The Edwards Law Firm
1101 E. 11th Street,
Austin, Texas 78702-1908

Via CMRRR 7010 1870 0000 9847 2950

and via e-mail to:

jeff@edwards-law.com
scott@edwards-law.com
david@edwards-law.com

Attorneys for UTMB Defendants

Lee Haney

Via e-mail to: Lee.Haney@oag.texas.gov

Kara Stauffer

Via e-mail to: Kara.Stauffer@asb.legal

/s/Amanda M. Kates

AMANDA M. KATES

Assistant Attorney General